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**To: California Energy Commission**

**Date October 11, 2004**

**Subject: Docket Issue 04-AAER-1**

**To the Commission:**

Euro-Pro Operating, LLC would like to take this opportunity to express our concerns and to provide comments on the subject Docket Issue. While Euro-Pro appreciates the California Energy Commission's (CEC) position, we believe that there are certain areas that could best be addressed with alternative methods.

The CEC has included all types of battery chargers in the above referenced proposal for evaluation. It is Euro-Pro's position that the CEC should use the same proposal as the Environmental Protection Agency's Energy Star program, excluding battery chargers from similar requirements for power supplies.

Specifically, we believe that, in section 1602 (s), the CEC should use the same definition as EPA Energy Star in the final version of the Energy Star Program for Single Voltage External Power Supplies. In addition, with regard to section 1602 (s), the CEC should exempt the same types of products as in the EPA's Energy Star Program for Single Voltage External Power supply until an appropriate test can be developed. Lastly, in section 1604 (u) (1), the CEC should use the more recent version of the EPA Energy Star test procedure, and not the February 13, 2004 version.

Euro-Pro's main concern is that the test program is not suitable for products employing batteries as their source of energy. Again, the EPA has studied this issue and has seen fit to separate battery chargers from the scope of its requirements

Euro-Pro is further concerned that confusion will ensue if two different sets of requirements are established. As the EPA has already agreed on one set, it will benefit consumers in California to have only one requirement to follow. Many products are available through the internet, television shopping networks and "info-mercial". Even if California does not allow products that are available to the rest of the nation, consumers could potentially inadvertently bring in products that are not allowed in California through the above referenced channels

Best Regards,

Ralph Hudnall  
Lab Manager

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